

Appendix K. DEIS COMMENTS AND RECOMMENDATIONS FROM THE MONUMENT ADVISORY COMMITTEE

Santa Rosa and San Jacinto Mountains National Monument Advisory Committee

June 7, 2003 Meeting

Comments and Recommendations on the Draft Resource Management Plan and Draft Environmental Impact Statement for the Santa Rosa and San Jacinto Mountains National Monument

Background: In order to preserve the nationally significant biological, cultural, recreational, geological, educational and scientific values found in the Santa Rosa and San Jacinto Mountains, and to secure now and for future generations, the opportunity to experience and enjoy the magnificent vistas, wildlife, landforms and natural and cultural resources of these mountains, the 106th Congress agreed by unanimous consent to the establishment of the Santa Rosa and San Jacinto Mountains National Monument (Monument). The passage of this legislation and the signing into law by President Clinton on October 24, 2000 established a 272,000 acre National Monument encompassing 86,400 acres of Bureau of Land Management lands, 64,400 acres of U.S. Forest Service lands, 23,000 acres of Agua Caliente Band of Cahuilla Indians lands, 8,500 acres of California Department of Parks and Recreation lands, 34,500 acres of other State of California agencies lands, and 55,200 acres of private land.

Monument Advisory Committee: The Santa Rosa and San Jacinto Mountains National Monument Act of 2000 (Public Law 106-351) further established a Monument Advisory Committee (Committee) “To advise the Secretary of the Interior and the Secretary of Agriculture with respect to the preparation and implementation of the management plan for the conservation and protection of the National Monument...” This Committee was created in November 2001 consistent with the Federal Advisory Committee Act and consists of the following individuals, who have generously contributed their time and experience (without compensation) over the past two years to assist in the development of the Draft Management Plan and Draft Environmental Impact Statement:

- Frank Bogert, former Mayor, City of Palm Springs
- Robert Brockman, Community Development Director, City of Rancho Mirage
- Buford Crites, Council member and former Mayor, City of Palm Desert
- Bary Freet, Palm Springs Fire Chief, resident of Cathedral City
- Barbara Gonzales Lyons, Vice Chairman, Agua Caliente Band of Cahuilla Indians
- Larry Grafton, Senior Planner, City of Indian Wells (2002)
- Bill Havert, Director, Coachella Valley Mountains Conservancy
- Terry Henderson, Council member, City of La Quinta
- Edward Kibbey, Building Industry Association, local building organization
- Bob Lyman, Regional Office Manager, County of Riverside
- Jeffrey Morgan, Sierra Club, local conservation organization
- Dr. Allan Muth, Director, University of California Deep Canyon Desert Research Center
- Rob Parkins, General Manager, Winter Park Authority
- Mary Roche, Council member, City of Indian Wells (2003)
- Ruth Watling, Chair, Pinyon Community Council
- Gary Watts, District Superintendent, California State Parks

Overview of Committee's Process: The Committee has met many times since its creation to identify relevant issues and responsive management strategies for managing the newly created National Monument. The Committee developed detailed recommendations for addressing each of the identified issues in a formal report that was submitted to the U.S. Forest Service (USFS) and Bureau of Land Management (BLM) in December 2002.** USFS and BLM considered the Committee's recommendations in developing the Draft Monument Management Plan and Draft Environmental Impact Statement (Draft Plan), which was published for public review in March 2003.

The Committee recognized that their recommendations might not being accepted as decisions or proposed actions from the USFS or BLM and that some of the recommendations and advice provided may not be addressed in the jointly prepared BLM/USFS Draft Plan given the scope of related planning efforts currently in progress (e.g., Coachella Valley Multiple Species Habitat Conservation Plan/Natural Community Conservation Plan (MSHCP/NCCP), San Bernardino National Forest Plan Revision, Agua

** The Committee's Recommendations for Management Plan Consideration Report is included as Appendix B to the Draft National Monument Management Plan and Draft Environmental Impact Statement.

Caliente Band of Cahuilla Indian's Habitat Conservation Plan, and the Coachella Valley California Desert Conservation Area Plan Amendment). However, the Committee believed strongly that the recommendations covered a wide range of important topics that must be addressed in order to adequately care for the Monument.

Committee's Review of the Draft Management Plan and Environmental Impact Statement: With publication of the Draft Plan, the Committee agreed to continue to rely on work groups to review specific aspects of the Draft Plan and to prepare written comments for the entire Committee to consider. Similar groups had been used to identify issues and develop potential management strategies earlier in the Committee's deliberations. Building on this success, a number of Committee members volunteered to serve on a variety of specific work groups, identified below:

- Biological, Scientific, and Geological: Dr. Allan Muth and Jeff Morgan
- Cultural and Educational Resources: Barbara Gonzales Lyons, Bary Freet, and Ruth Watling
- Recreation and Visitors Access: Frank Bogert, Buford Crites, and Jeff Morgan
- Hazards and Fire: Bary Freet
- Water Resources and Acquisitions: Bill Havert and Jeff Morgan

Each Working Group reviewed the Draft Plan and the Biological, Scientific, and Geological Working Group, the Cultural and Educational Resources Working Group, and several individual Committee members provided written comments to BLM/USFS staff. The Recreation and Visitor Access, Hazards and Fire, and Water Resources and Acquisitions Working Groups did not provide written comments, but indicated that members retained the right to provide comments during the public comment period, which ends June 19, 2003. Many of the reviewers expressed appreciation of the BLM/USFS's efforts in preparing the Draft Plan.

Committee's Consolidated Comments on the Draft Management Plan and Environmental Impact Statement: With the assistance of the Center for Collaborative Policy, BLM staff compiled all received comments into a summary document that was presented to the Committee. To ease the Committee's review of this document, the comments are sorted by the chapter of the Draft Plan to which they apply. In addition, comments which apply to the overall contents and/or format of the document are presented in a "General Comments" section.

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The Committee reviewed and discussed the consolidated Working Group's comments at its June 7, 2003 meeting. The remainder of this document presents the Committee's consensually agreed upon formal comments on the Draft Plan. The Committee understands that USFS/BLM staff will use these comments and questions, in addition to the comments received during the public comment period, to produce the final National Monument Management Plan and Environmental Impact Statement.

General Comments

1. The entire Draft Plan needs a careful reading by a good editor to catch minor editorial, punctuation, and grammatical errors.
2. There are too many strategies that focus on "seeking partnerships" to accomplish objectives (pages 2-10 though 2-13 for example). While the Committee understands that many policies and strategies cannot be successfully implemented without other agency assistance, the emphasis should be on the desired action not the partnering process. The Committee supports the federal agencies' promotion of collaboration and recommends the use of "in partnership with..." language where appropriate.
3. Be consistent throughout Draft Plan. Make sure document is consistent with usage of the words Tribe, Tribes, Native Americans, and various acronyms.

Executive Summary

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| 4. | Table ES1-1 | Pacific Crest Trail, Preferred Alternative is duplicated on pages ES-22 and 25. |
| 5. | Pg. ES-23, 26 | Recreational Shooting alternative strategies are duplicated on both pages. |
| 6. | Pg. ES-24, 20 | Strategic Recreation Management alternative strategies are duplicated on both pages. |
| 7. | Pg. ES-30 | Strategic Recreation Management elements presented on ES-30 are not numbered in sequence. |

Chapter 2 – Alternatives and Strategies

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| 8. | Pg. 2-8 | Bottom of page - Reference to Section 2-C.3 is misleading as the more informative description of how Native American coordination and consultation is provided on page 2-14. Description of policy |
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- and management guidance included in Table 2-1 on page 2-37 should be included in a more robust discussion on page 2-14.
9. Pg. 2-9 paragraph #2 - add Soboba Band to list of consulted tribes.
 10. Pg. 2-9 “Preferred Plan (Alternatives A, B, and C)”, 2nd bullet - change “...significant cultural and historic sites and events” to “...significant cultural and historical events”.
 11. Pg. 2-9 2nd to last paragraph - change “Desert District” to “CDCA”.
 12. Pg. 2-10 last paragraph, last sentence – change “Native American” to “Native American Tribes as identified during the public scoping process and thru consultation”.
 13. Pg. 2-11 paragraph #3, 4th sentence - replace “fencing” with “protective barriers to”.
 14. Pg. 2-11 paragraph #4 - Review Section 304 National Historic Protection Act and provide more detailed description of what law provides for.
 15. Pg. 2-12 “Alternative A, B, and C”, 5th bullet - change the word “ceramics” to “pottery”.
 16. Pg. 2-13 1st bullet - capitalize “Cultural Resources Management Plan”.
 17. Pg. 2-14 last paragraph, 4th sentence - remove “(in most cases)”. Add clarifying language if maintained.
 18. Pg. 2-24 “Management of Educational Resources”- The cultural resources work group would like the Committee to further discuss the proposed approach and consider including more specific actions.
 19. Pg. 2-25 last sentence – delete the sentence “The following would be implemented as a sign strategy:” as it is unnecessary.
 20. Pg. 2-26 Under “Preferred Plan (Alternative A, B, and C)”, 8th bullet - add “tribal organizations” to list of parties to coordinate with.
 21. Pg. 2-27 “Management of Scientific Resources,” 4th bullet - “... all applications for research within the National Monument would be addressed and approved by the National Monument Manager.” This wording could be interpreted to mean that the manager would approve all applications for research. Delete the quoted sentence and insert a new bullet with this wording: “All applications for research within the Monument would be reviewed by the National Monument Manager and approval or denial of a permit application by the National Monument Manager would be based on compliance with the conservation objectives, Land Health Standards, and Standards and Guidelines for the area of interest.”

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22. Pg. 2-27 “Management of Visitation, Facilities, Safety, and Uses-Access” - The narrative begins with a description of access to non-federally owned land across public land. The preferred strategy addresses access to federal land across non-federal lands. There is either narrative or another policy missing. Please clarify.
23. Pg. 2-33 In light of the attempted exchange of Department of Fish and Game land that the Committee opposed, a policy against the disposition of federal land in the Monument was discussed. On page 3-81 there is a summary of two land exchanges and the statement that "no other land is currently available for exchange within the National Monument". This would imply that other exchanges could be considered later. This reinforces the Committee's suggestion that an exchange policy be addressed. The legislation should be referenced when addressing future land exchanges applying to BLM and Forest Service lands. The committee recommends that future land exchanges involving federal lands be brought to the attention of the Monument Advisory Committee for comment. The Committee recommends that it be a notifying agency in NEPA documentation. The MAC would then request cooperation with other non-federal land-managing entities within the National Monument in providing information about future land exchanges.
24. Pg. 2-37 “Adaptive Management and Monitoring Program - Plan Monitoring” - There is mention of "the task force" at the top of page 2-37. We could not find an earlier reference to this task force. The task force needs to be described in greater detail in the Draft Plan.
25. Pg. 2-37 Table 2-1 on that page should have introductory language that describes the table.

Chapter 3 – Affected Environment

26. Pg. 3-17-18, Appendix G – Species accounts are incomplete. Page 3-18 indicates that accounts for endemic, sensitive and proposed species are in Appendix G. American Badger is not listed in the text (3-17 and 18). Jerusalem cricket is duplicated. Black-tailed gnat catcher has no account.
27. Pg. 3-23, 3rd paragraph - The California Department of Fish and Game has additional requirements for collection in a Game Refuge. Insert the following: “Game Refuges are a specific exclusion on Scientific Collecting Permits. Collecting within a Game Refuge requires a specific amendment to the Permit by Fish and Game.”

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| 28. | Pg. 3-23 | 2 nd paragraph, 4 th sentence - change “are be” to “will be”. |
| 29. | Pg. 3-23 | last paragraph, 3 rd sentence - replace “Eastside” to “Diamond Valley Lake”. |
| 30. | Pg. 3-25 | 4 th paragraph - who are Garces, Diaz and Bautista? Add relevance to the plan. |
| 31. | Pg. 3-25 | last paragraph, 3 rd sentence - add “garnet” and “tourmaline” to list of minerals. |
| 32. | Pg. 3-25 | last paragraph, 6 th sentence - change “cement” to “concrete”. |
| 33. | Pg. 3-26 | 2 nd paragraph - insert description of earlier attempts to establish a National Monument in the 1920’s. This can be added to page 3-3. |
| 34. | Pg. 3-27 | 3 rd paragraph, 6 th sentence - add comma in 9,850. |
| 35. | Pg. 3-28 | Under Section 3.C.3 text - change references to “Tribe” to “tribal members”. |
| 36. | Pg. 3-29 | 1 st paragraph, 1 st and 3 rd sentences - add “Monument” after the word “National”. |
| 37. | Pg. 3-29 | Under Section 3.D.1 - add the geographic location of the Visitor Center. |
| 38. | Pg. 3-29 | Under Section 3.D.1, 7 th sentence - delete the word “volunteer”. |
| 39. | Pg. 3-29 | Under Section 3.D.1 - Change to summer season. |
| 40. | Pg. 3-45 | Under Section 3.F - add “& Environmental Education” between the words “Interpretive” and “Concept”. |
| 41. | Pg. 3-45 | Section 3.F. – The work group believes this section should be re-written. |
| 42. | Pg. 3-46 | What are “short trail signs”? This needs to be clarified. |
| 43. | Pg. 3-47 | The work group believes this section should be re-written. |

Chapter 4 – Environmental Consequences

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| 44. | Pg. 4-73 | As part of the discussion of population and tourism impacts to resources beginning on this page, some mention should be made of the recently installed bighorn sheep fence in Rancho Mirage. This fence is a good example of the cooperative efforts of federal, state, local and private |
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entities to protect bighorn sheep from the impact of growth. Maybe in the second paragraph on page 4-75. Use the term protective barrier here and add to definitions.

45. Pg. 4-7-13 Change references to “tribe” to “tribal members”.
46. Pg. 4-7 Under Section 4.B.2 - the work group believes this section should be re-written.
47. Pg. 4-8 1st sentence - add a period (.) to “outlined below”.
48. Pg. 4-10 Include a reference to a tribal member gathering policy for collecting in areas within the National Monument. Policy will apply to tribes with traditional ancestral gathering areas within the National Monument.
49. Pg 3-43 Correct San Jacinto spelling
50. Recreation Section Geocaching - incorporate language to address monitoring this activity with future management changes to be added as needed. Include a component of education for this activity.
51. Pg 2.5 Management of noxious, non-native, etc. : Add the word animal. Use the word invasive species.
52. Pg 3.72 Maintain pinyon campground road forward to the Forest Service to incorporate into the current Forest Service Planning process.
53. Recreation Section Terminology : ultralight, parasailing, hang gliding, Need to consider other gliding sports.

Non-consensus Recommendation:

Several Monument Advisory Committee members recommended that a permit system may be adequate to address hang gliding needs as well as the biological needs of the sheep and other wildlife. A study would be required to analyze impacts to the environment. A recommendation was provided that the preferred should be changed from Alternative B to Alternative A. This was not supported by consensus vote from the entire Monument Advisory Committee.